

**CR 12-0489**

RJB:PKC  
F.# 2012R00987

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 27 2012 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**BROOKLYN OFFICE**

- - - - -X

I N D I C T M E N T

UNITED STATES OF AMERICA

- against -

KYLON LASHLEY, also known as  
"Cash,"

Defendant.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C.,  
§ 981(a)(1)(C),  
1591(a)(1), 1591(a)(2),  
1591(b)(2), 1594(d)(1),  
1594(d)(2), 2 and 3551  
et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C.,  
§ 461(c))

*KYLON LASHLEY*  
*Also known as "Cash"*  
THE GRAND JURY CHARGES:

SEX TRAFFICKING OF A CHILD

1. In or about June 2012, within the Eastern District of New York and elsewhere, the defendant KYLON LASHLEY, also known as "Cash," together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe, a person whose identity is known to the Grand Jury, in and affecting interstate commerce, and did benefit, financially and by receiving things of value from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that Jane Doe had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts.

(Title 18, United States Code, Section 1591(a)(1),  
1591(a)(2), 1591(b)(2), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the above-charged offense, the government will seek forfeiture: (a) in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d)(2), and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense; and (b) in accordance with Title 18, United States Code, Section 1594(d)(1), which requires any person convicted of such offense to forfeit any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;

or

(e) has been commingled with other property which cannot be divided without difficulty;

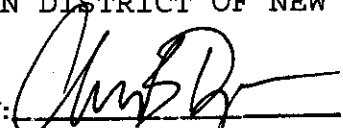
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant, up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Sections 981(a)(1)(C), 1594(d)(1) and 1594(d)(2); Title 21, United States Code, Section 853(p))

A TRUE BILL

  
FOREPERSON

\_\_\_\_\_  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136

**UNITED STATES DISTRICT COURT**

EASTERN District of NEW YORK

THE UNITED STATES OF AMERICA

vs.

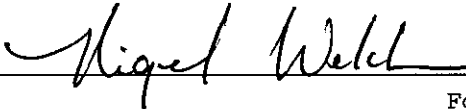
KYLON LASHLEY, also known as "Cash,"

Defendant.

**I N D I C T M E N T**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1591(a)(1),  
1591(a)(2), 1591(b)(2), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461 (c)

A true bill.



Foreman

Filed in open court this 27th day.

Of July A.D. 2012

Clerk

Bail, \$ \_\_\_\_\_

Pamela Chen, AUSA (718) 254-7575